UNITED STATES BANKRUPTCY	COURT
DISTRICT OF NEW JERSEY	

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Counsel to the Debtor

and Debtor in Possession

In re:

ALUMINUM SHAPES, L.L.C.,

Debtor.

Chapter 11

Case No. 21- _____ - ()

DEBTOR'S APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

Aluminum Shapes, L.L.C., as debtor and debtor in possession in the above-captioned chapter 11 case ("Debtor"), by and through its undersigned proposed counsel, submits this application for expedited consideration of first day matters pursuant to Rule 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey and respectfully requests that a hearing on the following applications and motions be provided on an expedited basis:

- 1. Application for Retention of Obermayer Rebmann Maxwell & Hippel LLP as Counsel to the Debtor [Docket No. 11]
- Application for Admission Pro Hac Vice of Michael D. Vagnoni, Esq. [Docket No. 14]

- 3. Application for Retention of Winter Harbor LLC as Interim Company Management, Designate Dalton Edgecomb as Chief Restructuring Officer, and Designate Jordan Meyers as Interim Chief Financial Officer [Docket No. 2]
- 4. Application for Retention of Epiq Corporate Restructuring, LLC as Claims and Noticing Agent [Docket No. 4]
- 5. Application for Retention of Cowen and Company, LLC as Investment Banker [Docket No. 3]
- 6. Application for Retention of Berwyn Capital Interests as Restructuring Agent [Docket No. 4]
- 7. Motion Pursuant to 11 U.S.C. §§ 105(a) and 521(a) and Fed. R. Bankr. P. 1007(c) for Entry of an Order Extending the Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 7]
- 8. Motion Pursuant to 11 U.S.C. §§ 105(a), 363(b), 506(b), 507(a), and 541 for Entry of an Order Authorizing, But Not Directing, the Debtor to Make Post-Petition Payments and Disbursements with Respect to Certain Prepetition Taxes [Docket No. 8]
- 9. Motion for Authority to (I) Maintain, Renew, and Continue Insurance Policies and Programs and (II) Honor All Insurance Obligations [Docket No. 12]
- 10. Motion Pursuant to 11 U.S.C. §§ 105 and 363 Authorizing the Debtor to Continue Using Existing Bank Accounts and Business Forms and for Related Relief [Docket No. 10]
- 11. Motion Pursuant to 11 U.S.C. §§ 105 and 366 Prohibiting Utilities from Altering, Refusing, or Discontinuing Services of Account of Prepetition Claims, Establishing Procedures for Determining Requests for Additional Adequate Assurance and for Related Relief [Docket No. 9]
- 12. Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a), 363 and 507(a) for Authority to (I) Pay Certain Pre-Petition Wages, Salaries and Reimbursable Employee Expenses; (II) Pay and Honor Employee Medical and Other Benefits; (III) Continue Employee Benefits Programs; and (IV) for Related Relief [Docket No. 13]
- 13. Combined Motion for Entry of: an Order Granting (A) Authority to Obtain Postpetition Financing, (B) Liens and Super Priority Administrative Expense Status Pursuant to 11 U.S.C. §§ 364(c)(1), (2) and (3) and 364(d)(1), (C) Relief from the Automatic Stay and (D) Authority to Enter into Agreements with Tiger Finance, LLC, (E) Authorization to Use Cash Collateral Pursuant to 11 U.S.C. §§ 361 and 363,

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Bankruptcy Rule 4001 and D.N.J. LBR 4001-4 and to Provide Adequate Protection to Parties with an Interest in Cash Collateral and (F) Related Relief [Docket No. 15]

WHEREFORE the Debtor respectfully requests entry of an Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Respectfully Submitted,

Dated: August 15, 2021 By: /s/ Edmond M. George

Edmond M. George, Esquire

Michael D. Vagnoni, Esquire (pro hac vice pending)

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